

EXHIBIT A-9

WSOU's July 19, 2021 Proposed Claim Terms for Construction (Dkt. 29-9)

EXHIBIT 9
WSOU's July 19, 2021
Proposed Claim Terms
for Construction

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-00923-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-00924-ADA
<i>Plaintiff,</i>	§	CIVIL ACTION 6:20-cv-00925-ADA
	§	CIVIL ACTION 6:20-cv-00926-ADA
v.	§	CIVIL ACTION 6:20-cv-00927-ADA
	§	
NEC CORPORATION,	§	
<i>Defendant.</i>	§	
	§	

**PLAINTIFF WSOU INVESTMENTS, LLC D/B/A BRAZOS LICENSING
AND DEVELOPMENT'S PROPOSED CLAIM TERMS FOR CONSTRUCTION**

Pursuant to the Court’s Order Governing Proceeding – Patent Case (“Order Governing Proceeding”), Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Plaintiff” or “WSOU”) states the following:

WSOU's position is that each term of the asserted claims of the asserted patents (U.S. Patent Nos. 7,577,103, 7,885,398, 8,041,017, 8,103,213, and 9,065,918) requires no construction and should be given its plain and ordinary meaning as read by a person of ordinary skill in the art at the time of the invention, in the context of the entire patent, including the specification and drawings. *See Phillips v. AWH Corp.*, 415 F.3d 1303, 1313 (Fed. Cir. 2005) (*en banc*); *Golden Bridge Tech., Inc. v. Apple Inc.*, 758 F.3d 1362, 1365 (Fed. Cir. 2014).

Further, WSOU reserves the right to amend the foregoing statement in the event further discovery or development of the evidence warrants such an amendment. Further, WSOU reserves the right to contend that terms or phrases might be in need of construction, such as after review and consideration of Defendant NEC Corporation's disclosures.

Dated: July 19, 2021

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ATTORNEYS FOR PLAINTIFF
WSOU INVESTMENTS, LLC
d/b/a BRAZOS LICENSING AND
DEVELOPMENT

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record, on this 19th day of July, 2021.

/s/ Jonathan K. Waldrop

Jonathan K. Waldrop